

EXHIBIT 2

From: Gregory Schwed
Sent: Friday, September 11, 2015 2:22 PM
To: 'jrollinson@bakerlaw.com'; 'ncremona@bakerlaw.com'; 'owang@bakerlaw.com'
Cc: Paul Z. Lewis - Lewis & McKenna (PLewis@lewismckenna.com); ggoett@lewismckenna.com; Richard A Kirby (richard.kirby@bakermckenzie.com); Clinton, Laura K (Laura.Clinton@bakermckenzie.com); Daniel B. Besikof
Subject: Madoff – Picard v. Cohen - Adv. No. 10-04311 (SMB)

We represent various good-faith defendants in avoidance actions brought by the Trustee. It's recently come to our attention that the above-referenced adversary proceeding is scheduled for trial on October 14-16, 2015. See Revised Joint Pretrial Order dated August 28, 2015 (Dkt. No. 11154; 080-1789-SMB).

The Pretrial Order indicates that the issues to be tried include the applicability and nature of (1) the "value" defense and (2) prejudgment interest, if any.

These are issues that vitally affect our clients (and many other good-faith defendants). On behalf of our clients (and speaking for certain other similarly situated counsel who we have been in contact with), we ask if the Trustee would consent to our motion to intervene in this case.

We would seek to intervene only for the limited purpose of having an opportunity to brief these legal issues. Our intervention would have no effect on the trial schedule, or the trial witnesses or exhibits. (According to the Pretrial Order, it appears as if any briefing would take place only after the trial itself.)

Defendant has consented to such an intervention.

Needless to say, I'm happy to discuss the matter or provide more information, at your request.

Greg Schwed
Loeb & Loeb LLP
345 Park Avenue
New York, NY 10154
Tel: 212-407-4815
Fax: 212-937-4689